



2. Proposed Pretrial Schedule.

- |  |                   |
|--|-------------------|
| a. End of Fact Discovery                                   | October 18, 2013  |
| b. Expert Disclosure (Fed. R. Civ. P. 26(a)(2))            | November 1, 2013  |
| c. Rebuttal Expert Disclosure                              | November 15, 2013 |
| d. End of Expert Discovery                                 | December 20, 2013 |
| e. Deadline for Submission of Motions for Summary Judgment | February 7, 2014  |

3. Consent to Trial By Magistrate Judge

The parties are willing to consent to trial by a magistrate judge.

**B. Settlement Proposal**

The Commission has communicated a written settlement proposal to Mr. Baldwin.

**C. Discovery Events**

With regard to the limitations on discovery events set forth in Local Rule 26.1(C), neither the Commission nor Mr. Baldwin anticipates needing to exceed the default limit of ten depositions. No other discovery issues currently are foreseen.

**D. Status of Initial Disclosures**

None of the parties has served initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 26.2(A).

**E. Alternative Dispute Resolution**

No agreement has been made at this time for consent to alternative dispute resolution.

**G. Local Rule 16.1(D)(3) Certifications**

The Commission's certification pursuant to Local Rule 16.1(D)(3) is being submitted with this Joint Statement.

April 9, 2013

Respectfully submitted,

**Plaintiff:**

//s// Martin F. Healey

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CERTIFICATE OF SERVICE

I, Martin F. Healey, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to any indicated as non-registered participants on this date.

Date: April 9, 2013

//s// Martin F. Healey  
Martin F. Healey